

LEVIN-EPSTEIN & ASSOCIATES, P.C.

60 East 42nd Street • Suite 4700 • New York, New York
10165 T: 212.792-0048 • E: Jason@levinepstein.com

November 13, 2023

Via ECF

The Honorable Jessica G. L. Clarke, U.S.D.J
U.S. District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Brown et al v. CE Solutions Group, LLC et al*
Case No.: 23-cv-03029

Dear Honorable Judge Clarke,

This law firm represents Plaintiffs Darnell Brown, Jeremiah Jones, Ronald Turner, Terri Coleman, Phillip Barnes, Charles Shokanji, Joseph Miranda, Andres Reyes, Smithfuerte Reyes, Jadrien Smith, Melissa Thompson and Ticky Rowe (collectively, the “Plaintiffs”) in the above-referenced matter. This letter is submitted jointly with counsel for Defendants CE Solutions Group, LLC, CE Solutions Inc. and Jeannine Napoleone-Colbert (collectively, the “Defendants”).

Pursuant to Your Honor’s Individual Motion Practice Rules, this letter respectfully serves as a request to extend the parties’ deadline to respond to Your Honor’s October 12, 2023 Order [Dckt. No. 42] from November 13, 2023 to, through and including, December 13, 2023.

This is the second request of its nature. If granted, this request would not affect any other Court scheduled deadlines.

The basis of this request is that the parties are still working on finalizing the necessary paperwork to effectuate the disposition of this matter.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

Jason Mizrahi
60 East 42nd Street, Suite 4700
New York, New York 10165
Tel. No.: (212) 792-0048
Email: Jason@levinepstein.com
Attorneys for Plaintiffs

VIA ECF: All Counsel